

# EXHIBIT H

UNITED STATES DISTRICT  
COURT NORTHERN DISTRICT OF  
OHIO EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

This document relates to:

*Track One Cases*

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

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**AMERISOURCEBERGEN DRUG CORPORATION'S SECOND  
SUPPLEMENTAL OBJECTIONS AND RESPONSES TO  
PLAINTIFFS' COMBINED DISCOVERY REQUESTS**

AmerisourceBergen Drug Corporation (ABDC) re-asserts and submits this second set of supplemental objections and responses to Plaintiffs' Combined Discovery Requests.

Contrary to representations made by the Plaintiffs Executive Committee (PEC) at the hearing before the Court on November 20, 2018, ABDC already provided substantive responses to Plaintiffs' (First) Combined Discovery Requests on July 31, 2018. Pursuant to the direction of Special Master Cohen, ABDC's responses identified documents produced by ABDC that contain responsive information. At no time prior to the November 20, 2018 hearing did the PEC, or ABDC's assigned discovery handlers, contend that ABDC's responses to Plaintiffs' Combined Discovery Requests were deficient.

The PEC's suggestion that ABDC has not produced information relating to its Suspicious Order Monitoring System (SOMS) is simply wrong. As set forth below, ABDC has produced a significant amount of detailed information relating to its SOMS; that previously-produced information is directly responsive to the below requests. *See* ABDC Production Log attached hereto. Notably, on June 1, 2018, ABDC produced a twenty-five page Memorandum (Bates Nos. ABDCMDL00004578-4602) that described in detail the operations and functionality of both ABDC's Legacy (Past) Diversion Control Program (2007-2014) and

Current Diversion Control Program (2014 to the present). This Memorandum provides a narrative description, along with 502 pages of corresponding exhibits, reflecting, among other things, ABDC's Policies and Procedures, Training and Education, New Customer Due Diligence, Order Monitoring Program, Resource and Oversight, Ongoing Monitoring and External Review that were associated with both the Legacy and Current Diversion Control Programs. *See* ABDCMDL00004603-5104.

In addition, ABDC has searched for, identified and already produced to Plaintiffs documents relating to ABDC's SOMS in effect from approximately 1998 to 2007, including, but not limited to, communications with the DEA in which DEA grants approval for that 1998 system. *See* ABDCMDL00269347-269358.

Finally, ABDC has made available (and continues to make available) its employees (current and former) from the Corporate Securities and Regulatory Affairs Department who are (or were) responsible for ABDC's diversion control programs, and its employees who are responsible for sales, government affairs, and other departments:

<b>Nam</b>	<b>Title</b>	<b>Deposition Date</b>
Chris Zimmerman	Senior Vice President of Corporate Security & Regulatory Affairs (formerly Vice President of Corporate Security & Regulatory Affairs and Chief Compliance Officer)	August 3, 2018; February 8, 2019
David May	Vice President of Diversion Control & Security (formerly Senior Director, Diversion Control & Federal Investigations)	August 4, 2018
Steve Mays	Senior Director, Corporate Security & Regulatory Affairs	October 24, 2018; February 8, 2019

Name	Title	Deposition Date
Edward Hazewski	Director of Diversion Control & Security (formerly Manager of the Diversion Control Program (2008-2016) and Director Security Systems & Services (2016-2018))	October 25, 2018
Bruce Gundy	Director of Investigations & Security	November 7, 2018
Eric Cherveny	Director of Diversion Control & Security	November 9, 2018
Nathan Elkins	District Director, Sales	November 14, 2018
Kevin Kreutzer	Diversion Control Investigator	November 27, 2018
Sharon Hartman	Director of Pharmacy Compliance & Diversion Control	November 29, 2018
Nikki Seckinger	Diversion Control Investigator	December 12, 2018
Elizabeth Garcia	Diversion Control Investigator (former)	December 14, 2018
Rita Norton	Senior Vice President, Government Affairs and Public Policy	January 9, 2019
Gabriel Weissman	Senior Vice President, Communications	January 17, 2019
Michael Amen	Director, Sales Compensation	January 25, 2019
Celia Weber	Senior Director, Marketing & Operations	January 25, 2019

Plaintiffs have deposed all of these witnesses and have obtained hours of testimony concerning the functionality of ABDC's diversion control programs. In particular, Chris Zimmerman and David May, who were deposed as both fact and 30(b)(6) witnesses, were designated and deposed as corporate witnesses on a wide range of topics relating to ABDC's SOMS for the period of 2006 to 2018. Thus, there is absolutely no basis for PEC's suggestion to the Court that ABDC has not already provided information about its diversion control programs.

In addition to the above, ABDC supplements its responses to Nos. 1-6 of Plaintiffs' Combined Discovery Requests as follows.

### **OBJECTIONS AND RESPONSES**

ABDC incorporates herein by reference its General Objections, Objections to Definitions and Instructions, and Reservation of Rights as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests.

### **COMBINED DISCOVERY REQUESTS**

**Request No. 1.** Please produce all *transactional data* related to Opioids and/or Opioid Products from January 1, 1996 to the present; please identify the Bates stamp range for each related to *Case Track One*.

#### **RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions. ABDC further objects to this Combined Request on the ground that the term "transactional data" is vague, ambiguous and subject to multiple interpretations. ABDC further objects to this Combined Request to the extent that the geographic scope is greater than or inconsistent with that established pursuant to Discovery Ruling Nos. 2 and 3. Subject to and without waiving its objections, to the extent that it possesses such information or that such information can be retrieved without unreasonable burden, ABDC has produced Opioid-related transactional data for Cleveland, Cuyahoga County, and Summit County during the period from January 1, 1996 to the date of this Response. By way of further response, responsive documents have been produced at ABDCMDL00037402, ABDCMDL00037404, ABDCMDL00037406, ABDCMDL00279848-ABDCMDL00279853, ABDCMDL00306728-ABDCMDL00306729, ABDCMDL00308071, ABDCMDL00313653-ABDCMDL00313654, and ABDCMDL00316111-ABDCMDL00316114.

**Request No. 2.** Please produce each of your *Suspicious Order Monitoring System*

(SOMS) policies and procedures since January 1, 2006 and identify the Bates stamp range for each; please identify the effective date(s) each was in force and effect.

**RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests.

Subject to and without waiving its objections, to the extent that it possesses such information, ABDC has produced its Order Monitoring Program policies and procedures in effect during the period from January 1, 2006 to May 29, 2018 at ABDCMDL00000011-ABDCMDL00000190; ABDCMDL00002169-ABDCMDL00002231; ABDCMDL00002261-ABDCMDL00002440; ABDCMDL00002642-ABDCMDL00002704; ABDCMDL00002713-ABDCMDL00002785; ABDCMDL00003039-ABDCMDL00003087; ABDCMDL00003089-ABDCMDL00003115; ABDCMDL00003117-ABDCMDL00003135; ABDCMDL00003220-ABDCMDL00003355; ABDCMDL00003367-ABDCMDL00003502; ABDCMDL00003686-ABDCMDL00003746; ABDCMDL00003949-ABDCMDL00004095; ABDCMDL00004264-ABDCMDL00004326; ABDCMDL00004481-ABDCMDL00004553; ABDCMDL00017004-ABDCMDL00017085; ABDCMDL00035379-ABDCMDL00035408; ABDCMDL00035418-ABDCMDL00035430; ABDCMDL00035445-ABDCMDL00035461; ABDCMDL00035500-ABDCMDL00035529; ABDCMDL00035535-ABDCMDL00035537; ABDCMDL00035707-ABDCMDL00035709; ABDCMDL00037316-ABDCMDL00037400; ABDCMDL00169890-ABDCMDL00170123; ABDCMDL00172093-ABDCMDL00172134; ABDCMDL00355517-ABDCMDL00355598; ABDCMDL00355611-ABDCMDL00355620; ABDCMDL00359842-ABDCMDL00360025; ABDCMDL00360029-ABDCMDL00360034; ABDCMDL00360182-ABDCMDL00360193; ABDCMDL00360208-ABDCMDL00360228; ABDCMDL00360276-

ABDCMDL00360313; ABDCMDL00364267-ABDCMDL00364390; ABDCMDL00379675-ABDCMDL00379842.<sup>1</sup>

**Request No. 3.** Please identify and describe each *suspicious order* your Suspicious Order Monitoring System (SOMS) identified since January 1, 2006 and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

**RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Combined Request to the extent it implies that an order flagged by ABDC's Order Monitoring Program is a "suspicious order." To the contrary, once an order is flagged by ABDC's Order Monitoring Program for further review, it is further reviewed to determine whether it is "suspicious."

Subject to and without waiving its objections, to the extent that it possesses such information, ABDC has produced Documents sufficient to identify orders flagged by ABDC's Order Monitoring Program for further review, as well as orders that were determined to be suspicious and reported to the DEA, from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at

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<sup>1</sup> In addition to the above-listed documents, responsive documents found within custodial files have also been produced.

ABDCMDL00383973-ABDCMDL00383974 (2012-2018: Cuyahoga County, Summit County); ABDCMDL00279840, ABDCMDL00379674 (2007-2012: Summit County); ABDCMDL00279843, ABDCMDL00379673 (2007-2012: Cuyahoga County); ABDCMDL00279846, ABDCMDL00379672 (2007-2012: City of Cleveland); ABDCMDL00308068-ABDCMDL00308070 (2008-2012: Cuyahoga County, Summit County, City of Cleveland). After a reasonable investigation, ABDC has not located documents that reflect the suspicious orders it reported to the DEA prior to July 1, 2007.

**Request No. 4.** Please identify each suspicious order you *reported* to the DEA since January 1, 1996 and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

**RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs.

Subject to and without waiving its objections, to the extent that it possesses such information or that such information can be retrieved without unreasonable burden, for the period from July 1, 2007 to May 29, 2018, ABDC has produced Documents sufficient to identify suspicious orders reported to the DEA relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00383973-ABDCMDL00383974 (2012-2018: Cuyahoga County, Summit County); ABDCMDL00379674 (2007- 2012: Summit

County); ABDCMDL00379673 (2007-2012: Cuyahoga County); ABDCMDL00379672 (2007-2012: City of Cleveland). In addition to the above-listed documents, responsive documents can be found within ABDC's productions of the CSRA Share Drive, LawTrac, Matter Management System, Tableau files, and custodial files. After a reasonable investigation, ABDC has not located documents that reflect the suspicious orders it reported to DEA prior to July 1, 2007.

**Request No. 5.** For each suspicious order you identified but did not report to the DEA since January 1, 2006, please describe in as much detail as possible the reasons and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

**RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Combined Request to the extent it implies that an order flagged by ABDC's Order Monitoring Program is a "suspicious order." To the contrary, once an order is flagged by ABDC's Order Monitoring Program for further review, it is further reviewed to determine whether it is "suspicious."

Subject to and without waiving its objections, ABDC states that it reports all orders determined to be suspicious to the DEA, and that after reasonable investigation, it is not aware of any orders identified as suspicious that were not reported to DEA. By way of further response, ABDC has produced Documents sufficient to identify the action taken for orders flagged by

ABDC's Order Monitoring Program for further review from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00383973-ABDCMDL00383974 (2012-2018: Cuyahoga County, Summit County); ABDCMDL00279840, ABDCMDL00379674 (2007-2012: Summit County); ABDCMDL00279843, ABDCMDL00379673 (2007-2012: Cuyahoga County); ABDCMDL00279846, ABDCMDL00379672 (2007-2012: City of Cleveland); ABDCMDL00308068-ABDCMDL00308070 (2008-2012: Cuyahoga County, Summit County, City of Cleveland). After a reasonable investigation, ABDC has not located documents that reflect its Order Monitoring Program data prior to July 1, 2007.

**Request No. 6.** For each suspicious order your reported to the DEA since January 1, 2006, please identify whether you declined the order or *shipped* the order and produce all documents related thereto; please identify the Bates stamp range for each related to *Case Track One*.

**RESPONSE:**

ABDC incorporates herein by reference its General Objections and Objections to Definitions and Instructions as set forth in its Objections and Responses to Plaintiffs' Combined Discovery Requests. ABDC further objects to this Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cuyahoga or Summit Counties in Ohio, or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Summit or Cuyahoga Counties in Ohio that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to this Combined Request to the extent it implies that an order flagged by ABDC's Order Monitoring Program is a "suspicious order." To the contrary, once an order is flagged by ABDC's Order Monitoring Program for further review, it is further reviewed to determine whether it is "suspicious." ABDC further objects to this Request to the extent it suggests that

there is a “Shipping Requirement” in the relevant federal regulations.

Subject to and without waiving its objections, ABDC states that after reasonable investigation, for the period from July 1, 2007 to May 29, 2018, it is not aware of any orders determined to be suspicious that were shipped to a customer. By way of further response, ABDC has produced Documents sufficient to identify the action taken for orders flagged by ABDC’s Order Monitoring Program for further review from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cuyahoga or Summit Counties in Ohio at ABDCMDL00383973-ABDCMDL00383974 (2012-2018: Cuyahoga County, Summit County); ABDCMDL00279840, ABDCMDL00379674 (2007-2012: Summit County); ABDCMDL00279843, ABDCMDL00379673 (2007-2012: Cuyahoga County); ABDCMDL00279846, ABDCMDL00379672 (2007-2012: City of Cleveland); ABDCMDL00308068-ABDCMDL00308070 (2008-2012: Cuyahoga County, Summit County, City of Cleveland). After a reasonable investigation, ABDC has not located documents that reflect its Order Monitoring Program data prior to July 1, 2007.

Dated: March 4, 2019

Respectfully submitted,

/s Robert A. Nicholas

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2019, the foregoing was sent by electronic mail to Counsel for the Plaintiffs and Defendants as follows:

***Plaintiffs' Designated Distribution List:***

mdl2804discovery@motleyrice.com

***Defendants' Designated Distribution List:***

xALLDEFENDANTS-MDL2804-Service@arnoldporter.com

*/s Robert A. Nicholas*

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**MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions**

<b>ABDC MDL Volume Number</b>	<b>Beginning MDL Bates Number</b>	<b>Ending MDL Bates Number</b>	<b>Description</b>	<b>Produced</b>
ABDCMDL_VOL001	ABDCMDL00000001	ABDCMDL00002155	Prior Production: Multistate Attorneys General	6/1/2018
ABDCMDL_VOL002	ABDCMDL00002156	ABDCMDL00002248	Prior Production: New Hampshire Attorney General	6/1/2018
ABDCMDL_VOL003	ABDCMDL00002249	ABDCMDL00002256	Prior Production: Mississippi Board of Pharmacy	6/1/2018
ABDCMDL_VOL004	ABDCMDL00002257	ABDCMDL00002260	Prior Production: Mississippi Attorney General	6/1/2018
ABDCMDL_VOL005	ABDCMDL00002261	ABDCMDL00002639	Prior Production: New Jersey Attorney General	6/1/2018
ABDCMDL_VOL006	ABDCMDL00002640	ABDCMDL00003219	Prior Production: Indiana Attorney General	6/1/2018
ABDCMDL_VOL007	ABDCMDL00003220	ABDCMDL00003366	Prior Production: Lake County, IL State's Attorney's Office	6/1/2018
ABDCMDL_VOL008	ABDCMDL00003367	ABDCMDL00003746	Prior Production: Alaska Attorney General	6/1/2018
ABDCMDL_VOL009	ABDCMDL00003747	ABDCMDL00003748	Prior Production: United States Senate Committee on Homeland Security and Governmental Affairs	6/1/2018
ABDCMDL_VOL010	ABDCMDL00003749	ABDCMDL00004230	Prior Production: United States House of Representatives Committee on Energy and Commerce	6/1/2018

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL_VOL011	ABDCMDL00004231	ABDCMDL00005106	Prior Production: South Carolina Attorney General	6/11/2018
ABDCMDL_VOL012	ABDCMDL00005107	ABDCMDL00017003	Prior Production: DOJ and DEA Subpoena from District of New Jersey	6/11/2018
ABDCMDL_VOL013	ABDCMDL00017004	ABDCMDL00035365	Prior Production: DOJ and DEA Subpoena from Denver, CO Field Office	6/11/2018
ABDCMDL_VOL014	ABDCMDL00035366	ABDCMDL00037251	Prior Production: <i>State of West Virginia ex rel. v. AmerisourceBergen Drug Corporation, et al.</i> , No. 12-C-141 (W. Va. Cir. Ct. – Boone Cnty.)	6/11/2018
ABDCMDL_VOL015	ABDCMDL00037252	ABDCMDL00037315	Prior Production: Multistate Attorneys General	6/11/2018
ABDCMDL_VOL016	ABDCMDL00037316	ABDCMDL00037401	Prior Production: DOJ and DEA Subpoena from Northern District of West Virginia	6/11/2018
ABDCMDL_VOL017	ABDCMDL00037402	ABDCMDL00037418	Documents responsive to MDL Plaintiffs' Requests for Production Nos. 32-33 and Interrogatory No. 3	6/11/2018
ABDCMDL_VOL018	ABDCMDL00037419	ABDCMDL00037427	Prior Production: Privilege logs produced in connection with documents productions responsive to Paragraph 9(k)(ii) of MDL CMO No. 1	6/11/2018

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL_VOL019	ABDCMDL00037428	ABDCMDL00043354	Insurance agreements and insurance coverage charts	6/14/2018
ABDCMDL_VOL020	ABDCMDL00043355	ABDCMDL00044996	Documents responsive to MDL Plaintiffs' Requests for Production and Interrogatories	7/3/2018
ABDCMDL_VOL021	ABDCMDL00044997	ABDCMDL00047016	Distribution agreements between ABDC and pharmaceutical manufacturers; Transactional, Order Monitoring Program, and Suspicious Order Reporting data for the State of Ohio for 2007-2017; Deposition transcripts and exhibits from <i>State of West Virginia ex rel. v. AmerisourceBergen Drug Corporation, et al.</i> , No. 12-C-141 (W. Va. Cir. Ct. – Boone Cnty.).	7/13/2018
ABDCMDL_VOL022	ABDCMDL00047017	ABDCMDL00155325	Custodial files from Eric Cherveny	7/20/2018
ABDCMDL_VOL023	ABDCMDL00155326	ABDCMDL00169849	Custodial files from David May	7/20/2018
ABDCMDL_VOL024	ABDCMDL00169850	ABDCMDL00172134	ABDC Annual Plans; Track One Customer Order Monitoring Program Thresholds; Industry Group Payment Information; Files collected from Corporate Security and Regulatory Affairs Share Drive	7/20/2018
ABDCMDL_VOL025	ABDCMDL00172135	ABDCMDL00248588	Custodial files from Eric Cherveny	7/27/2018
ABDCMDL_VOL026	ABDCMDL00248589	ABDCMDL00264103	Custodial files from David May	7/27/2018

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL_VOL027	ABDCMDL00264104	ABDCMDL00279650	Custodial files from Chris Zimmerman	7/27/2018
ABDCMDL_VOL028	ABDCMDL00279651	ABDCMDL00279853	Suspicious Order Reports to Ohio BOP; Track One Customer Order Monitoring Program Thresholds; Transactional, Order Monitoring Program, and Suspicious Order Reporting data for Track One Customers	7/27/2018
ABDCMDL_VOL024a	ABDCMDL00169888	ABDCMDL00169888	Replacement copy of native file spreadsheet containing errant “Privileged & Confidential – Attorney Client Work Product” footer	7/30/2018
ABDCMDL_VOL029	ABDCMDL00279854	ABDCMDL00279865	Settlement and Release Agreement entered into between DEA and ABDC	7/30/2018
ABDCMDL_VOL023_Clawback; ABDCMDL_VOL025_Clawback; ABDCMDL_VOL030	ABDCMDL00279866	ABDCMDL00279884	Claw back and reproduction of documents pursuant to August 2, 2018 letter	8/2/2018
ABDCMDL_VOL_Clawback24; ABDCMDL_VOL_Clawback26; ABDCMDL_VOL_Clawback27; ABDCMDL_VOL031	ABDCMDL00279885	ABDCMDL00280022	Claw back and reproduction of documents pursuant to August 3, 2018 letter	8/4/2018
ABDCMDL_VOL026_CLAWBACK; ABDCMDL_VOL027_CLAWBACK; ABDCMDL_VOL027_OVERLAY_ CLAWBACKS_2; ABDCMDL_VOL032	ABDCMDL00280023	ABDCMDL00280046	Claw back and reproduction of documents pursuant to August 10, 2018 letter	8/14/2018

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL_VOL033	ABDCMDL00280047	ABDCMDL00280635	Track One Customer Due Diligence Files; Track One Customer Prime Vendor Agreements	8/14/2018
ABDCMDL_VOL034	ABDCMDL00280636	ABDCMDL00281093	Custodial files from Ed Hazewski	8/17/2018
ABDCMDL_VOL035	ABDCMDL00281094	ABDCMDL00281211	Custodial files from Eric Cherveny	8/17/2018
ABDCMDL_VOL036	ABDCMDL00281212	ABDCMDL00281307	Files collected from Corporate Security and Regulatory Affairs Share Drive	8/17/2018
ABDCMDL_VOL037	ABDCMDL00281308	ABDCMDL00282047	Track One Customer Due Diligence Files	8/17/2018
ABDCMDL_VOL038	ABDCMDL00282048	ABDCMDL00282071	Track One Customer Due Diligence Files	8/24/2018
ABDCMDL_VOL039	ABDCMDL00282072	ABDCMDL00282757	Custodial files from Ed Hazewski	8/24/2018
ABDCMDL_VOL040	ABDCMDL00282758	ABDCMDL00285562	Custodial files from Steve Mays	8/24/2018
ABDCMDL_VOL041	ABDCMDL00285563	ABDCMDL00287855	Custodial files from Ed Hazewski	8/31/2018
ABDCMDL_VOL042	ABDCMDL00287856	ABDCMDL00289536	Custodial files from Steve Mays	8/31/2018
ABDCMDL_VOL043	ABDCMDL00289537	ABDCMDL00291162	Custodial files from Sharon Hartman	8/31/2018
ABDCMDL_VOL044	ABDCMDL00291163	ABDCMDL00295167	Custodial files from Steve Mays	9/7/2018
ABDCMDL_VOL045	ABDCMDL00295168	ABDCMDL00295613	Custodial files from Sharon Hartman	9/7/2018
ABDCMDL_VOL046	ABDCMDL00295614	ABDCMDL00298458	Custodial files from Elizabeth Garcia	9/7/2018
ABDCMDL_VOL048	ABDCMDL00298788	ABDCMDL00300250	Custodial files from Emily Coldren	9/20/2018
ABDCMDL_VOL049	ABDCMDL00300251	ABDCMDL00301209	Custodial files from Steve Mays	9/20/2018
ABDCMDL_VOL050	ABDCMDL00301210	ABDCMDL00302542	Files collected from Corporate Security and Regulatory Affairs Share Drive; 2006 Cuyahoga County transactional data	9/21/2018
ABDCMDL_VOL051	ABDCMDL00302543	ABDCMDL00304902	Custodial files from Kevin Kreutzer	9/21/2018

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL_VOL022_Clawback; ABDCMDL_VOL023_Clawback02; ABDCMDL_VOL024_Clawback02; ABDCMDL_VOL025_Clawback02; ABDCMDL_VOL026_Clawback03	ABDCMDL00298653	ABDCMDL00298787	Claw back and reproduction of documents pursuant to September 25, 2018 letter	9/25/2018
ABDCMDL_VOL052	ABDCMDL00304903	ABDCMDL00306357	Custodial files from Eric Cherveny	9/27/2018
ABDCMDL_VOL034R	ABDCMDL00280636	ABDCMDL00281093	Replacement production of ABDCMDL_VOL034 originally produced on August 17, 2018	9/27/2018
ABDCMDL_VOL053	ABDCMDL00306358	ABDCMDL00306727	Custodial files from Ed Hazewski	9/28/2018
ABDCMDL_VOL054	ABDCMDL00306728	ABDCMDL00306729	2005 Cuyahoga County transactional data 2006 Summit County transactional data	9/28/2018
ABDCMDL_VOL055	ABDCMDL00306730	ABDCMDL00308067	Custodial files from Steve Mays	10/5/2018
ABDCMDL_VOL056	ABDCMDL00308068	ABDCMDL00308071	2005 Summit County transactional data; Additional CSRA Reports from Legacy OMP	10/5/2018
ABDCMDL_VOL057	ABDCMDL00308072	ABDCMDL00313547	Custodial files from Steve Mays	10/10/2018
ABDCMDL_VOL058	ABDCMDL00313548	ABDCMDL00313652	Custodial files from Eric Cherveny	10/11/2018
ABDCMDL_VOL059	ABDCMDL00313653	ABDCMDL00313654	2004 Cuyahoga and Summit County transactional data	10/12/2018
ABDCMDL_VOL060	ABDCMDL00313655	ABDCMDL00315005	Custodial files from Bruce Gundy	10/22/2018
ABDCMDL_VOL061	ABDCMDL00315006	ABDCMDL00315782	Custodial files from Nikki Seckinger	10/22/2018
ABDCMDL_VOL062	ABDCMDL00315783	ABDCMDL00316110	Hard copy documents reflecting communications with the DEA	10/23/2018
ABDCMDL_VOL063	ABDCMDL00316111	ABDCMDL00316114	June 1, 2002 to December 31, 2003 Cuyahoga and Summit County transactional data	10/23/2018
ABDCMDL_VOL064	ABDCMDL00316115	ABDCMDL00316680	Custodial files from David May	10/24/2018
ABDCMDL_VOL065	ABDCMDL00316681	ABDCMDL00316952	Custodial files from Chris Zimmerman	10/24/2018
ABDCMDL_VOL066	ABDCMDL00316953	ABDCMDL00317472	Custodial files from Elizabeth Garcia	10/24/2018
ABDCMDL_VOL067	ABDCMDL00317473	ABDCMDL00317898	Custodial files from Kevin Kreutzer	10/24/2018

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL VOL068	ABDCMDL00317899	ABDCMDL00318209	Custodial files from Emily Coldren	10/24/2018
ABDCMDL VOL069	ABDCMDL00318210	ABDCMDL00318356	Custodial files from Sharon Hartman	10/25/2018
ABDCMDL VOL070	ABDCMDL00318357	ABDCMDL00318377	Custodial files from Teresa Javier	10/25/2018
ABDCMDL VOL071	ABDCMDL00318378	ABDCMDL00318830	Custodial files from Nathan Elkins	10/25/2018
ABDCMDL VOL072	ABDCMDL00318831	ABDCMDL00319191	Custodial files from Damacio Rodriguez	10/25/2018
ABDCMDL VOL073	ABDCMDL00319192	ABDCMDL00319262	Custodial files from Gabriel Weissman	10/25/2018
ABDCMDL VOL074	ABDCMDL00319263	ABDCMDL00319410	Custodial files from Amy Illig	10/25/2018
ABDCMDL VOL075	ABDCMDL00319411	ABDCMDL00319585	Custodial files from Kayla Kessler	10/25/2018
ABDCMDL VOL076	ABDCMDL00319586	ABDCMDL00319720	Custodial files from Connor Nell	10/25/2018
ABDCMDL VOL077	ABDCMDL00319721	ABDCMDL00320231	Custodial files from Celia Weber	10/25/2018
ABDCMDL VOL078	ABDCMDL00320232	ABDCMDL00320238	Custodial files from Valerie Johnson	10/25/2018
ABDCMDL VOL079	ABDCMDL00320239	ABDCMDL00322576	Custodial files from Rita Norton	10/25/2018
ABDCMDL VOL080	ABDCMDL00322577	ABDCMDL00322856	Custodial files from Kristen Perkins	10/25/2018
ABDCMDL VOL081	ABDCMDL00322857	ABDCMDL00322977	Custodial files from David Breitmayer	10/25/2018
ABDCMDL VOL082	ABDCMDL00322978	ABDCMDL00323468	Custodial files from Matthew Hurless	10/25/2018
ABDCMDL VOL083	ABDCMDL00323469	ABDCMDL00323618	Custodial files from James Schuster	10/25/2018
ABDCMDL VOL084	ABDCMDL00323619	ABDCMDL00323656	Custodial files from Hillary Knepper	10/26/2018
ABDCMDL VOL085	ABDCMDL00323657	ABDCMDL00323822	Custodial files from John Bryant	10/26/2018
ABDCMDL VOL086	ABDCMDL00323823	ABDCMDL00323864	Custodial files from Ashley Moore	10/26/2018
ABDCMDL VOL087	ABDCMDL00323865	ABDCMDL00325800	Custodial files from Lisa Bowes	10/26/2018
ABDCMDL VOL088	ABDCMDL00325801	ABDCMDL00325940	Custodial files from Julie Hinman (Papa)	10/26/2018
ABDCMDL VOL089	ABDCMDL00325941	ABDCMDL00326923	Custodial files from Tennille Ashworth	10/26/2018
ABDCMDL VOL090	ABDCMDL00326924	ABDCMDL00327687	Custodial files from Ronald Kline	10/26/2018
ABDCMDL VOL091	ABDCMDL00327688	ABDCMDL00329092	Custodial files from Jill Jackson	10/26/2018
ABDCMDL VOL092	ABDCMDL00329093	ABDCMDL00331090	Custodial files from Sarah Read	10/26/2018
ABDCMDL VOL093	ABDCMDL00331091	ABDCMDL00336745	Custodial files from Joseph Tomkiewicz	10/26/2018
ABDCMDL VOL094	ABDCMDL00336746	ABDCMDL00337410	Custodial files from Carol Sherman-Hynes	10/26/2018
ABDCMDL VOL095	ABDCMDL00337411	ABDCMDL00343514	Custodial files from Carli Kissling	10/26/2018
ABDCMDL VOL096	ABDCMDL00343515	ABDCMDL00352181	Custodial files from Gregory Hamilton	10/26/2018
ABDCMDL VOL097	ABDCMDL00352182	ABDCMDL00355513	Custodial files from Marcelino Guerreiro	10/26/2018

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL_VOL098	ABDCMDL00355514	ABDCMDL00355516	April 17-18, 2018 to May 29, 2018 City of Cleveland, Cuyahoga County, and Summit County transactional data	10/31/2018
ABDCMDL_VOL099	ABDCMDL00355517	ABDCMDL00355864	Files collected from the Corporate Security and Regulatory Affairs Share Drive	11/2/2018
ABDCMDL_VOL100	ABDCMDL00355865	ABDCMDL00355865	April 18, 2018 to May 29, 2018 City of Cleveland, Cuyahoga County, and Summit County Order Monitoring Program data	11/2/2018
ABDCMDL_VOL101	ABDCMDL00355866	ABDCMDL00357737	Custodial files from Michael Bramowski	11/5/2018
ABDCMDL_VOL102	ABDCMDL00357738	ABDCMDL00358082	Custodial files from Patrick Lazaro	11/5/2018
ABDCMDL_VOL103	ABDCMDL00358083	ABDCMDL00359841	Custodial files from Brad Tallamy	11/5/2018
ABDCMDL_VOL104	ABDCMDL00359842	ABDCMDL00360337	Files collected from the Corporate Security and Regulatory Affairs Share Drive	11/6/2018
ABDCMDL_VOL105	ABDCMDL00360338	ABDCMDL00360352	Custodial files from Eric Cherveny previously withheld as part of ABDC’s privilege review	11/8/2018
ABDCMDL_VOL106	ABDCMDL00360353	ABDCMDL00360356	Custodial files from Ed Hazewski previously withheld as part of ABDC’s privilege review	11/8/2018
ABDCMDL_VOL107	ABDCMDL00360357	ABDCMDL00360396	Track One Customer Due Diligence Files	11/9/2018
ABDCMDL_VOL108	ABDCMDL00360397	ABDCMDL00360399	Custodial files from Amy Illig previously withheld as part of ABDC’s privilege review	11/9/2018
ABDCMDL_VOL110	ABDCMDL00360404	ABDCMDL00362039	Custodial files collected from Sharon Hartman’s hard drive	11/15/2018
ABDCMDL_VOL109	ABDCMDL00360400	ABDCMDL00360403	Tableau Files utilized by ABDC’s Diversion Control Team	11/16/2018
ABDCMDL_VOL111	ABDCMDL00362040	ABDCMDL00364205	Custodial files from Paul Ross	11/16/2018
ABDCMDL_VOL112	ABDCMDL00364206	ABDCMDL00364266	Files collected from the Corporate Security and Regulatory Affairs Share Drive	11/16/2018
ABDCMDL_VOL113	ABDCMDL00364267	ABDCMDL00364390	Files collected from the Corporate Security and Regulatory Affairs Share Drive	11/28/2018

## MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions

ABDC MDL Volume Number	Beginning MDL Bates Number	Ending MDL Bates Number	Description	Produced
ABDCMDL_VOL114	ABDCMDL00364391	ABDCMDL00364395	Document from custodial file of Kevin Kreutzer inadvertently withheld from prior production	11/28/2018
ABDCMDL_VOL115	ABDCMDL00364396	ABDCMDL00364399	Tableau Files utilized by ABDC’s Diversion Control Team	11/29/2018
ABDCMDL_VOL116	ABDCMDL00364400	ABDCMDL00364745	Files collected from the Corporate Security and Regulatory Affairs Share Drive	12/7/2018
ABDCMDL_VOL117	ABDCMDL00364746	ABDCMDL00364823	Personnel file of Nikki Seckinger	12/7/2018
ABDCMDL_VOL118	ABDCMDL00364824	ABDCMDL00364860	Personnel file of Elizabeth Garcia	12/10/2018
ABDCMDL_VOL119	ABDCMDL00364861	ABDCMDL00364864	Additional document referenced in the personnel file of Elizabeth Garcia	12/11/2018
ABDCMDL_VOL120	ABDCMDL00364865	ABDCMDL00364871	Custodial files from Ronald Kline previously withheld as part of ABDC’s	12/13/2018
ABDCMDL_VOL121	ABDCMDL00364872	ABDCMDL00364880	Custodial files from Joseph Tomkiewicz previously withheld as part of ABDC’s	12/13/2018
ABDCMDL_VOL122	ABDCMDL00364881	ABDCMDL00365446	Custodial files from Bruce Gundy previously withheld as part of ABDC’s	12/13/2018
ABDCMDL_VOL123	ABDCMDL00365447	ABDCMDL00365460	Custodial files from David May previously withheld and logged on ABDC’s privilege	12/14/2018
ABDCMDL_VOL124	ABDCMDL00365461	ABDCMDL00365584	Custodial files from Eric Cherveny previously withheld and logged on ABDC’s	12/14/2018
SUPP_ABDCMDL_VOL025			Custodial files from Eric Cherveny previously redacted and logged on ABDC’s	12/18/2018
SUPP_ABDCMDL_VOL026			Custodial files from David May previously redacted and logged on ABDC’s privilege	12/18/2018
SUPP_ABDCMDL_VOL027			Custodial files from Chris Zimmerman previously redacted and logged on ABDC’s	12/18/2018
ABDCMDL_VOL125	ABDCMDL00365585	ABDCMDL00366305	Data received from IQVIA	12/18/2018

**MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions**

ABDCMDL_VOL126	ABDCMDL00366306	ABDCMDL00366326	Custodial files from Emily Coldren previously withheld as part of ABDC's	12/21/2018
ABDCMDL_VOL127	ABDCMDL00366327	ABDCMDL00366441	Custodial files from Elizabeth Garcia previously withheld as part of ABDC's	12/21/2018
ABDCMDL_VOL128	ABDCMDL00366442	ABDCMDL00366674	Custodial files from Carli Kissling previously withheld as part of ABDC's	12/21/2018
ABDCMDL_VOL129	ABDCMDL00366675	ABDCMDL00366771	Custodial files from Carol Sherman-Hynes previously withheld as part of ABDC's	12/21/2018
ABDCMDL_VOL130	ABDCMDL00366772	ABDCMDL00366971	Hard copy documents that were in Rita Norton's possession	12/28/2018
ABDCMDL_VOL131	ABDCMDL00366972	ABDCMDL00370417	Custodial files from Rita Norton previously withheld as part of ABDC's privilege	12/28/2018
ABDCMDL_VOL132	ABDCMDL00370418	ABDCMDL00370420	Custodial files from Eric Cherveny previously withheld and logged on ABDC's	1/3/2019
SUPPLEMENTAL_ABDCMDL_VOL025-027			Custodial files from Chris Zimmerman, David May, and Eric Cherveny previously	1/3/2019
ABDCMDL_VOL133	ABDCMDL00370421	ABDCMDL00375375	Custodial files from Robert Mauch	1/4/2019
SUPP_ABDCMDL_VOL022.zip; SUPP5_ABDCMDL_VOL027.zip;			Claw back and reproduction of documents pursuant to January 4, 2019 letter	1/4/2019
ABDCMDL_VOL134	ABDCMDL00375376	ABDCMDL00375379	Additional document from the custodial file of Rita Norton	1/8/2019
ABDCMDL_VOL135	ABDCMDL00375380	ABDCMDL00375468	Contracts between IQVIA and ABDC	1/9/2019
ABDCMDL_VOL136	ABDCMDL00375469	ABDCMDL00375558	Additional Track One Customer Due Diligence Files	1/9/2019
ABDCMDL_VOL137	ABDCMDL00375559	ABDCMDL00375725	Additional documents from the custodial file of Amy Illig	1/11/2019
ABDCMDL_VOL138	ABDCMDL00375726	ABDCMDL00375794	Additional documents from the custodial file of Gabriel Weissman	1/14/2019
ABDCMDL_VOL139	ABDCMDL00375795	ABDCMDL00378729	Custodial files from Marcelino Guerreiro, Sharon Hartman, David May, Stephen	1/15/2019
SUPP_ABDCMDL_VOL133	ABDCMDL00374571	ABDCMDL00374573	Claw back and reproduction of documents pursuant to January 17, 2019 letter	1/17/2019

**MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions**

ABDCMDL_VOL140	ABDCMDL0378730	ABDCMDL00378855	Additional documents from the custodial file of John Bryant	1/21/2019
ABDCMDL_VOL141	ABDCMDL00378856	ABDCMDL00378868	Additional documents from the custodial file of Carli Kissling	1/23/2019
ABDCMDL_VOL142	ABDCMDL00378869	ABDCMDL00378992	Additional Track One Customer Due Diligence Files	1/23/2019
ABDCMDL_VOL143	ABDCMDL00378993	ABDCMDL00378995	Additional document from the custodial file of Sarah Read	1/23/2019
ABDCMDL_VOL144	ABDCMDL00378996	ABDCMDL00379532	Custodial files from Paul Ross previously withheld as part of ABDC’s privilege	1/23/2019
ABDCMDL_VOL145	ABDCMDL00379533	ABDCMDL00379586	Custodial files from Stephen Mays previously withheld as part of ABDC’s	1/23/2019
ABDCMDL_VOL146	ABDCMDL00379587	ABDCMDL00379591	FY2018 Compensation Plan document	1/24/2019
ABDCMDL_VOL147	ABDCMDL00379592	ABDCMDL00379662	Additional Track One Customer Due Diligence Files	1/24/2019
ABDCMDL_VOL148	ABDCMDL00379663	ABDCMDL00379671	Personnel file of Celia Weber	1/24/2019
ABDCMDL_VOL149	ABDCMDL00379672	ABDCMDL00379674	Corrected spreadsheets reflecting Track One suspicious order reports for 2007-2012.	1/24/2019
ABDCMDL_VOL150	ABDCMDL00379675	ABDCMDL00380285	Documents from the CSRA Portlet; Additional documents from the custodial	1/25/2019
ABDCMDL_VOL151	ABDCMDL00380286	ABDCMDL00382594	Additional documents from the custodial file of Brad Tallamy; Track One jurisdiction	1/25/2019
ABDCMDL_VOL152	ABDCMDL00382595	ABDCMDL00383556	Additional documents from the custodial files of Rita Norton and Marcelino	1/25/2019
SUPP2_ABDCMDL_VOL027	ABDCMDL00276941	ABDCMDL00276951	Three Chris Zimmerman documents being re-produced with certain redactions removed	1/25/2019
ABDCMDL_VOL153	ABDCMDL00383557	ABDCMDL00383830	Documents related to DEA audits of ABDC’s Columbus, OH distribution center	2/4/2019
ABDCMDL_VOL154	ABDCMDL00383831	ABDCMDL00383972	Personnel files of Chris Zimmerman and Stephen Mays	2/6/2019
ABDCMDL_VOL022_SUPP2; ABDCMDL_VOL023_SUPP;			Documents being reproduced in unredacted form in accordance with Brian Himmel’s	2/8/2019

**MDL 2804 AmerisourceBergen Drug Corporation (“ABDC”) Document Productions**

ABDCMDL_VOL019-repaired			Documents originally produced as a part of ABDCMDL_VOL019 which Plaintiffs	2/8/2019
ABDCMDL_VOL155	ABDCMDL00383973	ABDCMDL00383974	Corrected spreadsheets reflecting Track One Customer suspicious order reports to the	2/12/2019
ABDCMDL_VOL156	ABDCMDL00383975	ABDCMDL00384062	Tableau Files utilized by ABDC’s Diversion Control Team	2/22/2019
ABDCMDL_VOL157	ABDCMDL00384063	ABDCMDL00395294	FTI-related documents that ABDC is withdrawing from its privilege log as	2/26/2019